

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION
www.flmb.uscourts.gov

In re:

Case No. 3:14-bk-03266-JAF

Chapter 13

Leonard Quinzell McRae,

Debtor.

NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING

Pursuant to Local Rule 2002-4, the Court will consider this objection without further notice or hearing unless a party in interest files an objection within twenty-one (21) days from the date of service of this paper plus an additional three days for service. If you object to the relief requested in this paper, you must file your objection with the Clerk of Court at 300 N Hogan St Ste 3-350, Jacksonville FL 32202-4267, and serve a copy on the movants' attorney, Lansing Roy, P.A., Christopher R. DeMetros, Esquire, 1710 Shadowood Ln Ste 210, Jacksonville FL 32207-2184, and any other persons.

If you file and serve an objection within the time permitted, the Court may schedule and notify you of a hearing, or the Court may consider the response and may grant or deny the relief requested without a hearing. If you do not file an objection within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

MOTION TO MODIFY CONFIRMED CHAPTER 13 PLAN


The Debtor, **Leonard Quinzell McRae** by and through the undersigned counsel, files this Motion to Modify Confirmed Chapter 13 Plan and move the Court for an Order pursuant to 11 U.S.C.

§1329(a)(2) to modify the confirmed Chapter 13 Plan to comply with the 100% distribution to unsecured claims that are filed and allowed. In support of the motion it is shown unto the Court as follows:

1. On December 17, 2014, the Court confirmed a Chapter 13 Plan dated November 21, 2014.
2. An Adjustment to the Plan is necessary to comply with the 100% distribution to unsecured claims that are filed and allowed
3. A proposed First Post Confirmed Modified Plan is attached.

WHEREFORE the Court is requested to enter an Order Modifying the Confirmed Chapter 13 Plan consistent with the terms and conditions set forth herein.


LANSING ROY, P.A.


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Florida Bar No. 0863467
Kevin B. Paysinger, Esquire
Florida Bar No. 0056742
William B. McDaniel, Esquire
Florida Bar No. 084469
Attorney for Debtor(s)
1710 Shadowood Lane, Suite 210
Jacksonville, FL 32207-2184
court@lansingroy.com
Telephone: (904) 391-0030
Facsimile: (904) 391-0031

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Debtors' **Motion to Modify Confirmed Chapter 13 Plan** together with a copy of the **First Post Confirmed Modified Plan** was furnished to all creditors and parties in interest as listed on the mailing matrix attached to the original document filed with the Court this 30th day of March 2015

LANSING ROY, P.A.


/s/ Christopher R. DeMetros
Christopher R. DeMetros, Esquire
Florida Bar No. 0863467
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Florida Bar No. 0056742
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Label Matrix for local noticing
113A-3
Case 3:14-bk-03266-JAF
Middle District of Florida
Jacksonville
Fri Mar 27 10:20:16 EDT 2015

BAYVIEW LOAN SERVICING
62516 COLLECTION CENTER DRIVE
Chicago IL 60693-0625

(p)CAVALRY PORTFOLIO SERVICES LLC
500 SUMMIT LAKE DR
STE 400
VALHALLA NY 10595-2322

Cavalry SPV I, LLC
500 Summit Lake Drive, Ste 400
Valhalla, NY 10595-1340

Florida Dept. of Revenue
Bankruptcy Unit
P.O. Box 6668
Tallahassee, FL 32314-6668

IC SYSTEM
FOR GREAT EXPRESSIONS DENTAL
PO BOX 64378
Saint Paul MN 55164-0378

Navient Solutions Inc. on behalf of USA Fund
Attn: Bankruptcy Litigation Unit E3149
P.O. Box 9430
Wilkes-Barre, PA 18773-9430

United States Attorney
300 North Hogan St Suite 700
Jacksonville, FL 32202-4204

Christopher R DeMetros +
Lansing Roy, PA
1710 Shadowood Lane, Suite 210
Jacksonville, FL 32207-2184

Brian R Kopelowitz +
Kopelowitz Ostrow Ferguson Weiselberg
200 Southwest 1st Avenue
12th Floor
Fort Lauderdale, FL 33301-1875

Bayview Loan Servicing LLC
c/o Brian Kopelowitz
200 SW 1st Avenue
Suite 1200
Fort Lauderdale, FL 33301-2073

Bayview Loan Servicing, LLC
c/o Kopelowitz Ostrow P.A.
200 SW 1st Avenue
Suite 1200
Fort Lauderdale, FL 33301-2073

CREDIT ONE BANK
PO BOX 98873
LAS VEGAS NV 89193-8873

City of Jacksonville
117 West Duval Street Ste. 480
Jacksonville, FL 32202-5721

GREAT EXPRESSIONS DENTAL CTRS
9119 MERRILL RD, STE 29 & 30
JACKSONVILLE FL 32225-4306

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

SALLIE MAE
PO BOX 9640
Wilkes Barre PA 18773-9640

WELLS FARGO DEALER SERVICES
ATTN: CORRESPONDENCE
MAC T9017-026
PO BOX 168048
Irving TX 75016-8048

United States Trustee - JAX 13/7 7+
Office of the United States Trustee
George C Young Federal Building
400 West Washington Street, Suite 1100
Orlando, FL 32801-2210

Note: Entries with a '+' at the end of the
name have an email address on file in CMECF

Leonard Quinzell McRae
10829 Naples Ct S
Jacksonville, FL 32218-4494

CAPITAL ONE BANK - CC
PO BOX 1366
Pittsburgh PA 15230-1366

Capital One Bank (USA), N.A.
PO Box 71083
Charlotte, NC 28272-1083

Duval County Tax Collector
231 Forsyth St. #130
Jacksonville FL 32202-3380

HSBC BANK USA N.A.
PO BOX 2013
Buffalo NY 14240-2013

MIDLAND FUNDING, LLC
FOR HSBC BANK
8875 AERO DR, STE 200
SAN DIEGO CA 92123-2255

TSYS DEBT MGMT (TDM)
CAPITAL ONE BANK
6125 LAKEVIEW RD STE 800
Charlotte NC 28269-2605

Wells Fargo Bank, N.A.
P.O. Box 19657
Irvine, CA 92623-9657

Douglas W. Neway +
P O Box 4308
Jacksonville, FL 32201-4308

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

CAVALRY PORTFOLIO
FOR HSBC BANK
4050 E COTTON CENTER BLVD
Phoenix AZ 85040

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Jerry A. Funk
Jacksonville

End of Label Matrix	
Mailable recipients	28
Bypassed recipients	1
Total	29